

**SIMON & PARTNERS LLP**

30 ROCKEFELLER PLAZA  
FORTY-SECOND FLOOR  
NEW YORK, NEW YORK 10112  
www.simonlawyers.com

(212) 332-8900

FAX: (212) 332-8909

BRADLEY D. SIMON  
BRIAN D. WALLER  
KENNETH C. MURPHY

NEW YORK  
WASHINGTON, D.C.  
PARIS

TERRENCE J. JOHNSON  
MARK ELLIS

COUNSEL  
PAMELA B. STUART  
HARRIET TAMEN  
JEREMY M. WEINTRAUB  
STEPHENIE L. BROWN

**MEMO ENDORSED**

September 8, 2008

Via Facsimile (212) 805-6326

Honorable Colleen McMahon  
United States District Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Room 640  
New York, New York 10007

9/9/08  
OK - File  
W

Re: *U.S. v. Charles Garland*  
07 CR 765 (CM)

Dear Judge McMahon:

I represent defendant Charles Garland in the above matter. Mr. Garland pled guilty to 18 U.S.C. § 2252A (a)(5)(B) and was sentenced to 18 months in prison on May 29, 2009. Mr. Garland has been designated to the MCC in Manhattan and remains on home detention with electronic monitoring until his voluntary surrender date of September 15, 2008. His travel is currently restricted to the Southern and Eastern Districts of New York, the District of New Jersey, and the District of Connecticut.

I am respectfully requesting that Mr. Garland be permitted to travel to his mother's home in Bourne, Massachusetts by car to spend his final weekend, before surrendering to prison, with his family. Additionally, Mr. Garland needs to transport certain valuables and possessions to his mother's home for storage and safekeeping for while he is incarcerated. **Specifically, I am respectfully requesting that Mr. Garland be permitted to leave New York after work on Friday night, September 12, 2008 at 9:30 p.m. and return to his apartment by midnight on Sunday night, September 14, 2008.** Mr. Garland will be meeting with Pretrial services to remove his electronic monitoring bracelet and surrendering to the MCC the following day. Pretrial Services has previously been provided with Mr. Garland's mother's address, telephone number and other pertinent contact information.

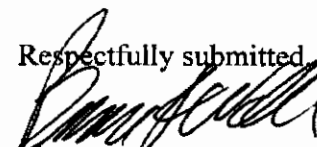
USDS SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 7/9/08

Assistant U.S. Attorney Todd Blanche has no objection to this request.

SIMON & PARTNERS LLP

Thank you for your attention to this matter. Please do not hesitate to contact me if you require additional information.

Respectfully submitted



Brian D. Waller

cc: AUSA Todd Blanche  
USPTO Jason Lerman